



5301 Wisconsin Avenue, NW  
Suite 800  
Washington, DC 20015  
T: 202-362-0041  
F: 202-362-2640  
[www.odonoghuelaw.com](http://www.odonoghuelaw.com)

August 1, 2025

**VIA ELECTRONIC FILING**

Honorable Peggy Kuo U.S.M.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: *Trustees of the Plumbers Local Union No. 1 Welfare Fund, et al. v. Spray in Place Solutions, LLC, et al.* 24 CV 2568 (KAM) (PK)**  
**Letter Proposing Dates for Rescheduled Pre-Motion Discovery Conference**

Dear Judge Kuo:

This firm represents Plaintiffs in the above-captioned action. Plaintiffs were unable to confirm Defendants' availability and therefore write in accordance with the Court's Order dated July 28, 2025, directing the parties to file a joint letter by August 1, 2025, proposing several dates for a rescheduled Pre-Motion Conference.

**a. Background**

Plaintiffs are seeking SIPS' compliance with a 2024 stipulation governing the production of documents. Despite the parties negotiating a stipulation in September 2024, under which SIPS was obligated to, *inter alia*, within 15 days of the execution of the Stipulation, produce all outstanding remittance reports through December 31, 2022, pay any undisputed contributions thereon determined to be due, and submit to an audit for the period of July 1, 2022 through December 31, 2022, as of the date of this letter, SIPS has not produced any outstanding documents, has not paid any undisputed amounts owed, and has not submitted to the audit.

On July 18, 2025, Plaintiffs respectfully requested a conference with the Court to resolve the ongoing discovery dispute and, if the dispute cannot be resolved, for a briefing schedule to brief a motion to compel.

On July 22, the Court granted Plaintiffs' Motion for Pre-Motion Conference in part, scheduling a Pre-Motion Conference for July 29, 2025.

On July 28, 2025, SIPS requested an adjournment of the Pre-Motion Conference due to counsel's unavailability on the scheduled date.

On July 28, 2025, the Court ordered the parties to file a joint letter by August 1, 2025 proposing several dates for a rescheduled Pre-Motion Conference.

**b. Plaintiffs Proposed Dates for the Rescheduled Conference**

Plaintiffs' counsel is available on the following dates:

August 6, 8, 11, 14, 18, 19.

**c. Defendant SIPS Position**

On July 28, 2025, Plaintiffs' counsel reached out to Defendant SIPS' counsel to propose the dates noted above and request that counsel advise if any of those dates do not work for them. A copy of the email is attached as Exhibit A. On July 30, 2025, Plaintiffs' counsel followed up with an email to Defendant's counsel to confirm their availability for the proposed dates and requested a response by 4pm on July 31, 2025. A copy of the email is attached as Exhibit B. Plaintiffs' counsel received no response from Defendant's counsel.

Accordingly, the Plaintiffs respectfully request the Conference with the Court be rescheduled for one of the dates proposed by the Plaintiffs.

Respectfully submitted,

*/s/ Diana R. Cohn*  
Diana R. Cohn  
*Counsel for the Plaintiffs*